

FILED FOR DISTRICT CLERK
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

U.S. DISTRICT COURT
CLERK
CHOOSE LIFE ILLINOIS, INC., an Illinois)
not-for-profit corporation, RICHARD)
BERGQUIST, SUE BERGQUIST, JAMES)
FINNEGAN, PHYLLIS FINNEGAN, DANIEL)
GURA, SANDRA GURA, BECKY)
MacDOUGALL, VIRGINIA McCASKEY,)
THOMAS MORRISON, BETHANY)
MORRISON, DAN PROFT, RICHARD)
STANEK, JILL STANEK, JOSEPH J.)
WALSH, and CAROL WALSH, individuals,)

Plaintiffs,)

vs.)

JESSE WHITE, an individual, sued in his)
official capacity as the Secretary of State of the)
State of Illinois,)

Defendant.)

*Plaintiffs Demand Trial By
Jury on all Juriable Issues*

NO.

JUDGE COAR

MAGISTRATE JUDGE MASON

DOCKETED
JUN 29 2004

COMPLAINT

Plaintiffs, Choose Life Illinois, Inc., an Illinois not-for-profit corporation, Richard and Sue Bergquist, James and Phyllis Finnegan, Daniel and Sandra Gura, Becky Mac Dougall, Virginia McCaskey, Thomas and Bethany Morrison, Dan Proft, Jill Stanek, Joseph J. and Carol Walsh, individual residents of the State of Illinois, complain of the defendant, Jesse White, acting in his Official Capacity as the Secretary of State of the State of Illinois, and his employees, agents, successors in office, as follows:

Nature of the Case

1. This is a civil rights action, pursuant to 42 U.S.C. § 1983, by which plaintiffs, an Illinois non-profit corporation as well as Illinois residents committed to foster and

promote the cause of adoption, sue to redress and repair the invidiously discriminatory denial of their fundamental right of access to a public forum – the display of their pro-adoption message, “choose life,” on automobile specialty license plates for which over 25,000 Illinois residents have signed petitions. Despite its repeated, unjustified, and arbitrary censorship of plaintiffs’ pro-adoption message, the State of Illinois has continued to make such specialty license plates freely accessible and available to other Illinois residents and groups promoting differing political viewpoints. As is more fully hereinafter alleged, this discriminatory exclusion of plaintiffs’ political speech from this otherwise generously accessible, salient segment of “the public square” in our State of Illinois, pursuant to an inherently flawed system that vests state officials with unbridled, utterly standardless discretion to approve or reject prospective applicants, such as plaintiffs, on the basis of the political viewpoints they would express, constitutes a blatant and flagrant instance of viewpoint discrimination. That in turn represents a serious infringement of plaintiffs’ fundamental rights under the First and Fourteenth Amendments to the United States Constitution to freedom of speech, due process of law and the equal protection of the laws.

The Parties

2. Plaintiff, Illinois Choose Life, Inc. (“Illinois Choose Life”) is an Illinois not-for-profit corporation, organized for charitable and educational purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code and Section 103.05 of the Illinois Not-for-Profit Corporation Act (“the Act”). Illinois Choose Life is in good standing with the State of Illinois. Pursuant to the Act, 805 ILCS 105/103.10(b)(West Supp. 2003), Illinois Choose Life is empowered to sue when one or more of its members

would otherwise have standing to sue in his or her own right, and here over 25,000 Illinois residents have signed petitions seeking the approval of a "choose life" specialty license plate in Illinois, many thousands of whom are committed to buy said license plate if ever approved and are aggrieved by its arbitrary and repeated disapproval. Also, the purpose of this lawsuit is clearly germane to the stated purposes of Illinois Choose Life, which are *inter alia* to "promote within the State of Illinois the adoption of children, to increase public awareness about the importance of adoption, to educate the public concerning the adoption of children," etc. Nor is the participation of individual members of Illinois Choose Life required either for the prosecution of this lawsuit or for the relief requested herein. For these same reasons, the plaintiff, Illinois Choose Life, also has standing to sue for its members herein as a matter of federal constitutional law, as the defendant has been joined in an actual "case or controversy," pursuant to Article III of the U.S. Constitution.

3. In any event, several members of Illinois Choose Life who are personally aggrieved by reason of the defendant's vague, subjective, and viewpoint-discriminatory enforcement of Illinois' flawed statutory scheme for the issuance of specialty auto license plates have elected to press claims herein, as individuals. They, too, must be granted to have standing to sue herein. The first of these Plaintiffs, Richard and Sue Bergquist, are married and reside in Naperville, Illinois. They have eleven children, nine of whom are adopted, and six of whom have special needs. The Bergquists are fervent advocates of adoption. They are aggrieved by the State of Illinois' failure to approve a "choose life" license plate, promoting adoption, which they would have purchased but for the plate's having been disapproved. The Bergquists are both directors of Illinois Choose Life.

4. Plaintiffs, James (“Jim”) and Phyllis Finnegan, also are a married couple residing in Barrington, Illinois. Jim Finnegan, a retired businessman, is president and a director of Illinois Choose Life. The Finnegans, who have seven children and twenty grandchildren, also have had family experiences with adoption, for which they too are fervent advocates. As Illinois automobile owners, they also have been aggrieved by the failure of the State of Illinois to approve the issuance of a specialty “choose life” license plate, which would both promote and generate revenue for the cause of adoption in Illinois, and which they would have purchased, had it been approved and offered for sale.

5. Daniel (“Dan”) Gura, a real estate appraiser, and Sandra (“Sandy”) Gura, his wife and a flight attendant, reside in Lake Zurich, Illinois. Married for nearly 11 years, the Guras have four children, two of whom are adopted. They too are strong advocates for adoption, and they would have purchased a “choose life” specialty license plate had it been approved and offered for sale by defendant, the Secretary of State for Illinois.

6. Becky MacDougall is one of the key personnel at Sunny Ridge Family Center in Wheaton, Illinois, an adoption aid organization. Ms. MacDougall, an adoptive mother herself, has been a tireless and outspoken advocate for adoption. She would have purchased a “choose life” license plate had it been approved and offered for sale in Illinois.

7. Virginia McCaskey, of the Chicago Bears, a resident of Des Plaines, Illinois, has urged that the wonderful promotion of adoption should not be made into a contentious political issue, as the “choose life” specialty license plates can be important in aiding the providers of adoption services. Virginia is a director of Illinois Choose Life..

8. Thomas (“Tom”) Morrison and Bethany Morrison, his wife, were recently married and reside in Palatine, Illinois. Tom teaches at the Christian Liberty Academy in Arlington Heights, Illinois. Together, the Morrison’s have crusaded ardently for the cause of adoption. As Illinois automobile owners, the Morrisons would have purchased a “choose life” specialty plate, had it been approved and offered for sale in Illinois.

9. Dan Proft is president of Illinois Leader Media Company and publisher of the *Illinois Leader*. He has been active in several Illinois political campaigns and has provided media relations and political guidance to Illinois Choose Life. The cause of adoption is dear to him, as he was adopted. Dan would have purchased an Illinois “choose life” specialty plate, had it been approved and offered for sale.

10. Richard and Jill Stanek, a married couple, reside in Mokena, Illinois. Jill Stanek’s revelations about Christ Hospital’s leaving infants, targeted for abortion who were nonetheless born alive, to die without medical care, won national attention and sparked the passage of the federal Infants Born Alive Protection Act two years ago. She has spoken out strongly and eloquently on behalf of adoption and, more specifically, in favor of Illinois’ approval of a “choose life” specialty license plate. The Staneks have been aggrieved by the State’s failure and refusal to approve such a plate and offer it for sale; had it been approved and offered, they would have bought such a specialty plate for a family automobile.

11. Joseph J. (“Joe”) and Carol Walsh have been married almost 35 years and reside in Libertyville, Illinois. They have four living children and six grandchildren. Carol is president and Joe is director of Lake County Right to Life. Both are directors of Aid for Women of Northern Lake County, a crisis pregnancy center in Waukegan which

opened its doors back in April, 1983. The Walshes have taken many people into their home in order to help them choose life, and they have advocated powerfully for Illinois' approval of a "choose life" specialty license plate, whose sale – to at least a very substantial portion of the more than 25,000 signatories (so far!) of a petition for approval of such a special license plate – would be likely to generate substantial revenue, for the benefit of both the State of Illinois and the cause of adoption.

12. Defendant, Jesse White, sued herein only in his Official Capacity as the Secretary of State of the State of Illinois ("the Secretary" or "Secretary White"), is charged with the statutory duty of issuing vehicle license plates and administering the special license plate programs in the State of Illinois.

Jurisdiction and Venue

13. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§1331, 1343(a)(3), and 1343(a)(4).

14. Plaintiffs' claim for declaratory and injunctive relief is authorized by 28 U.S.C. §§2201 and 2202; by Rules 57 and 65 of the Federal Rules of Civil Procedure; and by the general equitable powers of this Court.

15. Venue is properly laid in this District pursuant to 28 U.S.C. §1391(b).

Introduction

16. Motor vehicles registered in the State of Illinois generally need to bear license plates issued by the Illinois Secretary of State's Vehicle Services Department ("VSD") under the oversight and direction of the defendant, Jesse White, acting in his Official Capacity as Secretary of State of the State of Illinois. When vehicle owners request license plates from the VSD, the VSD typically gives owners a choice of license

plates. Either the owner can request standard license plates or he or she can pay extra and ask to purchase a specialty license plate ("specialty plate"). Such specialty plates bear a medley of various political and/or special interest messages which the vehicle owner may choose to purchase and display on his or her vehicle. The proceeds for purchase of these specialty license plates may inure to the benefit of the various special interest groups which sponsored each such specialty plate. The VSD advertises the availability of specialty plates through a variety of means, including *inter alia* through color flyers. A true and correct copy of pp. 1 through 8 inclusive of one such flyer is attached hereto as Exhibit A.

17. The statutory requirements for issuance of special plates in Illinois are prescribed at 625 ILCS 5/3-600. The Secretary of State is there barred from issuing a series of special plates "unless applications, as prescribed by the Secretary, have been received for 10,000 plates of that series; except that the Secretary of State may prescribe some other required number of applications if that number is sufficient to pay for the total cost of designing, manufacturing and issuing the special license plate." No other prerequisites (apart from notification of law enforcement on approval of any new plate) are set forth for the Secretary's approval and issuance of any new specialty license plate. Nevertheless, defendant White has issued a nine-point written policy relating to "New Plate Categories," a true copy of which is also attached hereto as Exhibit B. Pursuant to this policy, while defendant White reduced the requisite number of requests or applications for a new plate from the statutory target of 10,000 to an indefinite number "approach[ing] the 850 level (somewhere between 750 & 850 ...)," he also imposed an entirely new and independent requirement, that is nowhere required or even suggested in

the governing statutory provision (*supra*). Thus defendant White requires that, “Legislation must be introduced (by a legislator, either in the Senate or the House), passed by both chambers, and signed into law by the Governor. The Secretary can not arbitrarily begin issuing a new plate category.” (Exhibit B, ¶1). But this additional requirement for legislative approval fixes no standards, limits, criteria by which access to a new specialty license plate will be regulated or determined. Nor is there any transparency to this procedure, which provides for no findings, nor explanation, nor justification, much less for any judicial review in the event that efforts to secure legislative approval may fail. Thus plaintiffs challenge defendant White’s practice of awarding plates under this standardless, unguided, discretionary regulatory scheme which he administers simply by deferring to the naked *fiat* of the General Assembly. Defendant White determines which privately sponsored expressions and viewpoints may be expressed or proclaimed on Illinois’ specialty license plates based only on an “up” or “down” unexplained, arbitrary vote in the General Assembly – that is, if a proposed specialty plate should even proceed far enough through the legislative process to reach the voting stage. Under the current system, defendant White will allow the creation and distribution of a particular specialty plate only if the Illinois General Assembly agrees with the expression and viewpoint being proposed. Defendant White will not allow private groups and individuals interested in expressing views on their license plates to do so, if the General Assembly should not actually pass a bill approving of the expression of such views. This is an improper procedure that opens the door to content-based and viewpoint-sensitive censorship of unpopular or minority views that fall short of winning decisive majority support, that amounts to discriminatory banning of disfavored political

speakers from one of Illinois' most prominent *agora's* or "marketplaces of ideas." This violates Plaintiffs' free speech rights and equal protection rights under the First as well as the Fourteenth Amendments to the United States Constitution.

Narrative Facts

18. Thus defendant White oversees, implements, administers, and executes Illinois' specialty license plate statutory scheme by which private, non-profit organizations can seek to have special designs or messages printed on license plates that are then sold to the public at higher prices than ordinary or standardized license plates. There are currently some 60 specialty license plates which exist in Illinois, at least 27 of which have been privately "sponsored" by special interest or advocacy groups (numbers 1 through 27):

- (1) Korean War Veteran License Plates, 625 ILCS 5/3-626;
- (2) Environmental License Plate, 625 ILCS 5/3-627;
- (3) Prevent Violence License Plate, 625 ILCS 5/3-630;
- (4) Sportsmen Series License Plate, 625 ILCS 5/3-631;
- (5) Wildlife Prairie Park License Plate, 625 ILCS 5/3-632;
- (6) Illinois Firefighters' License Plate, 625 ILCS 5/3-634;
- (7) Master Mason Plates, 625 ILCS 5/3-635;
- (8) Knights of Columbus Plates, 625 ILCS 5/3-636;
- (9) DARE License Plates, 625 ILCS 5/3-637;
- (10) Illinois and Michigan Canal License Plates, 625 ILCS 5/3-640;
- (11) Mammogram License Plates, 625 ILCS 5/3-643;
- (12) Police Memorial Committee License Plates, 625 ILCS 5/3-644;

- (13) Organ Donor Awareness License Plates, 625 ILCS 5/3-646;
- (14) Education License Plates, 625 ILCS 5/3-648;
- (15) Hospice License Plates, 625 ILCS 5/3-648;
- (16) U.S. Marine Corps License Plates, 625 ILCS 5/3-651;
- (17) Pet Friendly License Plates, 625 ILCS 5/3-653;
- (18) Lewis and Clark Bicentennial License Plates, 625 ILCS 5/3-653;
- (19) September 11th "America Remembers" License Plates, 625 ILCS 5/3-653;
- (20) Illinois Route 66 License Plates, 625 ILCS 5/3-653;
- (21) Illinois Public Broadcasting System Stations License Plates, 625 ILCS 5/3-654;
- (22) Pan Hellenic License Plates, 625 ILCS 5/3-654;
- (23) Collegiate License Plates, 625 ILCS 5/3-629;
- (24) Chicago and Northeast Illinois District Council of Carpenters License Plates, 625 ILCS 5/3-652;
- (25) Park District Youth Program License Plates, 625 ILCS 5/3-654;
- (26) Professional Sports Teams License Plates, 625 ILCS 5/3-654;
- (27) Stop Neuroblastoma License Plates, 625 ILCS 5/3-654;
- (28) Members of the General Assembly, 625 ILCS 5/3-606;
- (29) Retired Members of the General Assembly, 625 ILCS 5/3-606.1;
- (30) Amateur Radio Operators, 625 ILCS 5/3-607;
- (31) Disabled Veterans, 625 ILCS 5/3-609;
- (32) Congressional Medal of Honor Recipients, 625 ILCS 5/3-609.1;
- (33) Members of Congress, 625 ILCS 5/3-610;

- (34) Retired Members of the Illinois Congressional Delegation, 625 ILCS 5/3-610.1;
- (35) Repossessor, 625 ILCS 5/3-612;
- (36) Special Inaugural License Plates, 625 ILCS 5/3-613;
- (37) Honorary Consular License Plates, 625 ILCS 5/3-615;
- (38) License Plates for Disabled Individuals, 625 ILCS 5/3-616;
- (39) Drivers Education, 625 ILCS 5/3-617;
- (40) Charitable Vehicle, 625 ILCS 5/3-618;
- (41) Ex-Prisoners of War, 625 ILCS 5/3-620;
- (42) Illinois National Guard, 625 ILCS 5/3-621;
- (43) Members of Armed Forces Reserves, 625 ILCS 5/3-622;
- (44) Purple Heart, 625 ILCS 5/3-623;
- (45) Retired Armed Forces, 625 ILCS 5/3-624;
- (46) Pearl Harbor Survivor, 625 ILCS 5/3-625;
- (47) Bronze Star License Plates, 625 ILCS 5/3-628;
- (48) Universal Charitable Organization License Plate, 625 ILCS 5/3-633;
- (49) Universal U.S. Veteran License Plates, 625 ILCS 5/3-638;
- (50) Special Registration Plates for a President of a Village or Incorporated Town or Mayor, 625 ILCS 5/3-639;
- (51) Deceased Police Officer or Firefighter License Plates, 625 ILCS 5/3-641;
- (52) Silver Star License Plates, 625 ILCS 5/3-642;
- (53) Vietnam Veteran License Plates, 625 ILCS 5/3-645;
- (54) World War II Veteran License Plates, 625 ILCS 5/3-647;

(55) West Point Bicentennial License Plates, 625 ILCS 5/3-649;

(56) Army Combat Veteran License Plates, 625 ILCS 5/3-650;

(57) Antique Vehicle, 625 ILCS 5/3-804;

(58) Custom Vehicle Plates, 625 ILCS 5/3-804.1;

(59) Street Rod Plates, 625 ILCS 5/3-804.2;

(60) Gold Star Plates, 625 ILCS 5/3-806.4;

(61) Personalized Plates, 625 ILCS 5/3-806.5.

19. One purpose of the special interest license plate program is to produce additional revenue in the millions of dollars for the state and/or defendant White's VSD by making special license plates available for purchase at higher prices than regular license plates. In addition, for those license plates which are privately sponsored (plates 1 - 27 as listed in the preceding paragraph), the sponsoring organization benefits by (a) sharing in the State's profits from the sale, (b) by the advertising and marketing exposure generated by the appearance on the plate of recognizable logos, pictures, or messages, and (c) providing those with a similar viewpoint an outlet (i.e., their license plate) to express their views on the topic in question.

20. Under the state scheme administered by defendant White, a non-profit organization interested in creating a specialty license plate must find an Illinois legislator to sponsor legislation authorizing the issuance of the specialty plate ("Enabling Legislation"). Such Enabling Legislation generally provides that a portion of proceeds from the purchase of the specialty plates will be deposited in a special fund in the State treasury to be distributed, subject to appropriation by the Illinois General Assembly and approval by the Secretary of State, to support the designated special interest. The only

exception is that the Secretary of State may, at his discretion, issue specialty plates for any public or degree-granting, not-for-profit private college or university located in Illinois (625 ILCS 5/3-629).

21. If and only if Enabling Legislation is enacted and the number of requests for the specialty license plate approaches 850 will defendant White allow the organization in question to work on proposed license plate designs in concert with the Communications Department of VSD. Such a submission must generally follow the strictures of 625 ILCS 5/3-412 for the plate's physical parameters. Enabling Legislation generally stipulates that the unique design and color of the specialty plates will ultimately be entirely within the Secretary's discretion. Once approved by defendant White, the specialty plates become available to the public, and consumers typically pay anywhere from \$15 and \$45 above standard registration fees to obtain a specialty plate from the VSD.

22. During the 2001-2002 legislative session, the Illinois General Assembly enacted, and the Governor signed into law, Enabling Legislation for specialty license plates to raise money and awareness for causes including, *inter alia*, education, pet overpopulation, park district youth programs, neuroblastoma research and prevention, and Pan-Hellenic charities. Such Enabling Legislation took between 5 and 12 months from the time of introduction in either body of the Illinois General Assembly to enactment and final approval by the Governor.

23. In a good faith attempt to follow the specialty license plate scheme administered by defendant White, in the 2001-02 legislative session Plaintiff Choose Life Illinois requested that then-Illinois State Senator Patrick O'Malley and Illinois State Representative Dan Brady sponsor Enabling Legislation for the purpose of making

available to vehicle owners specialty license plates which bear the phrase "Choose Life." These lawmakers agreed and introduced several "Choose Life" specialty license plate bills in the 2001-2002 legislative session, including SB 2426 and HB 3374.

24. In the 2003-2004 legislative session plaintiff, Choose Life Illinois, again requested sponsorship of Enabling Legislation for the purpose of making available to vehicle owners specialty license plates which bear the phrase "Choose Life." Illinois State Senator Kirk Dillard and Illinois State Representative Randall Hultgren agreed to sponsor such Enabling Legislation and introduced several "Choose Life" specialty license plate bills in the 2003-2004 legislative session, including SB 1502 and HB 0010. But during this latest session, the General Assembly has taken no further action to approve Enabling Legislation for a specialty license plate bearing the phrase "Choose Life."

25. Only if these bills had been enacted by the Illinois General Assembly, would defendant White have approved the "choose life" specialty license plates and could the proceeds from the DVS's sale of the "choose life" license plates be distributed (in part) to non-governmental, not-for-profit agencies throughout Illinois which provide counseling and other services to meet the needs of pregnant women who are committed to placing their newborn children for adoption.

26. Plaintiff Choose Life Illinois as a non-profit organization manifestly meets the requirements for distribution of funds and would have received funds from the sale of "choose life" specialty plates, if they had been approved. At the time of the bills' introduction, Choose Life Illinois had already received signed petitions requesting "Choose Life" plates from over 25,000 Illinois residents. All the viewpoint-neutral,

objective tests for approval of an Illinois specialty license plate were amply met by plaintiffs.

27. Each and every one of the bills proffered by State Senator O'Malley and State Representative Brady in the 2001-2002 legislative session (SB 2426 and HB 3374), and State Senator Dillard and State Representative Hultgren in the 2003-2004 legislative session (SB 1502 and HB 0010), failed to pass, amidst many expressions of hostility toward the message, "Choose Life," whereas as hereinabove alleged, specialty plates were approved for other advocacy groups and their causes, including pet overpopulation and pan-Hellenic charities.

CLAIM FOR RELIEF

(Violation of Constitutional Free Speech, Equal Protection & Due Process)

28. Plaintiffs hereby repeat and reallege each and every allegation contained in all preceding paragraphs as if fully set forth herein.

29. The entire process for approving special license plates in Illinois consists of a standardless, unguided, discretionary system enforced and executed by defendant White in which defendant White authorizes and allows the issuance of specialty plates bearing particular political messages only if the viewpoint expressed is deemed acceptable by a majority of legislators in the General Assembly, as proved by the enactment of Enabling Legislation.

30. This invidious, discriminatory process, as enforced and carried out by defendant White to bar and ban plaintiffs under color of Illinois law from access to the public forum to express their political message in favor of adoption, violates the free speech guarantee found in the First Amendment to the United States Constitution, the

Equal Protection guarantee found in the Fourteenth Amendment to the United States Constitution, as well as 42 U.S.C. §1983.

31. Plaintiffs request the issuance of a declaratory judgment, deeming this systematic resort to an invidious, discriminatory procedure for limiting access to a public forum for the expression of political viewpoints in the State of Illinois an unconstitutional abridgment of their fundamental rights.

32. To repair and remedy this constitutionally defective system for censorship and suppression of political messages, plaintiffs seek issuance of a temporary restraining order, preliminary injunction, and permanent injunction enjoining the defendant, and all those in active concert or participation with him, from awarding, approving, creating, or distributing further any specialty license plates under the current unlawful scheme. Further, they seek equitable relief barring the renewal or extension of previously issued specialty plates, so as to avert the perpetuation of invidious past discrimination in favor of preferred political viewpoints and in derogation of plaintiffs' fundamental rights.

33. Plaintiffs have been damaged by these deprivations of their fundamental constitutional rights. But they seek no monetary relief or damages, but only prospective injunctive relief in order to halt, cure and repair the serious legal flaws in the dispensation of Illinois' specialty license plates of which they complain in this lawsuit.

WHEREFORE, Plaintiffs pray for the following relief:

A. Issuance of a declaratory judgment declaring that defendant White's process, scheme and system for awarding, approving, creating, and distributing specialty license plates violates the First and Fourteenth Amendments to the United States Constitution, and the Civil Rights Act, 42 U.S.C. §1983;

B. Issuance of a temporary restraining order, preliminary injunction, and permanent injunction, enjoining and restraining defendant Jesse White, acting in his Official Capacity as Illinois Secretary of State, and all those in active concert or participation with him, from awarding, approving, creating, distributing any new specialty license plates absent a viewpoint-neutral and content-neutral set of guides, criteria, and standards for obtaining specialty plates, administered in an objective, neutral fashion, and in which individual decisions would be explained in writing, based on objective grounds rationally related to legitimate governmental concerns, and subject to appropriate judicial review;

C. Issuance of similar equitable relief tailored to prevent the renewal or extension of existing specialty license plates, expressing a favored political viewpoint, as approved by the current constitutionally tainted, discriminatory system;

D. An award of attorneys fees, costs, and expenses, pursuant to 42 U.S.C. §1988, and any other applicable law; and

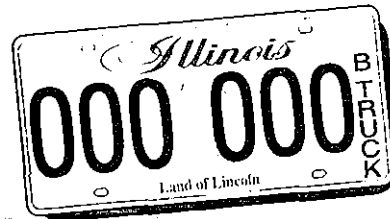
E. Such other relief as the Court may deem just and proper upon these premises in accordance with law.

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Attorney for Plaintiffs

2003-2004

LICENSE PLATE GUIDE



Jesse White • Secretary of State

Jesse White ★ Secretary of State



I am pleased to announce that, as promised, my office is well on the way to replating the more than 9 million vehicles on Illinois highways, from passenger cars to recreational vehicles.

Our main goal has always been to make license plates that are attractive but easily readable for law enforcement officials. Not only have we redesigned passenger plates for the first time in nearly 3 decades, but we now have new designs of Military, Sporting Series and Collegiate Plates. Newly-

designed Mammogram, Wildlife Prairie Park, Master Mason, Illinois/Michigan Canal, Ham Radio and Hearing Impaired specialty plates also are being replated. Motorists who have not received their new-design plates for these categories should call my office at 217-558-0515.

B-truck, Persons with Disability, Environmental, Prevent Violence, Firefighter Memorial, TA Trailer, Motorcycle and RV/RT license plates are also in the process of being replated. Motorists with these license plates will receive renewal notices in the mail. They must then renew by phone, online or at a Driver Services facility to receive their new-design plates. My continued appreciation goes out to all those dealers, remitters, currency exchanges, banks and facility personnel who have helped make this replating effort a success.

This new License Plate Guide includes information about several new specialty plates available to Illinois motorists. The Education Plate helps provide scholarships for college students pursuing teacher certifications in the state. A Pet Friendly Plate generates money to help prevent pet overpopulation. And the new Park District Plate provides funds for innovative after-school programs for our youth. For more information on these and other license plates, visit www.cyberdriveillinois.com.

Jesse White
Secretary of State

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Permanent Placard	32
Temporary Placard	32
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SECRETARY OF STATE DRIVER SERVICES FACILITIES

SECRETARY OF STATE VEHICLE SERVICES FACILITIES

The Office of the Secretary of State issues various license plates that require multi-year, staggered registration. These plates are issued to First Division (i.e., passenger) and Second Division vehicles weighing 8,000 pounds or less (i.e., trucks not used to carry freight or for transporting more than 10 persons). Each of these license plates are six inches in height by twelve inches in length. Illinois license plate specifications require the plates to be manufactured with reflective sheeting for night-time legibility. These license plates have numerals and/or alpha characters 2 3/4" high, helping meet the legal requirement that they be plainly readable from a distance of 100 feet during the day.

NOTE: For first-time purchasers, both plates and a sticker are issued. Each subsequent year, a renewal sticker is issued.

PASSENGER LICENSE PLATES

Passenger license plates are issued to most private passenger, fleet, leased and rental vehicles. Standard license plates are issued with randomly assigned letter and/or number combinations with the letters appearing first. Replacement license plates are issued for vehicles when the original license plates are lost, stolen or destroyed.

Vanity license plates are available for passenger vehicles upon written request. Vanity license plates have a maximum of seven letters only, or 1, 2 or 3 numbers only. Personalized license plates also are available.

Personalized license plates have a maximum of seven characters, with at least one number following the letters.

Deaf or Hard of Hearing license plates

Deaf or Hard of Hearing license plates are issued to a deaf or hard of hearing person with a Type 4 hearing disability or as provided under Section 4A of the Illinois Identification Card Act. The plate has an "H" prefix (625 ILCS 5/3-616).

Ham Radio Operator license plates

Ham Radio Operator license plates are available for amateur radio operators. The license plate number is the call number assigned by the Federal Communications Commission. For law enforcement purposes, the number zero (0) is the designate.

B-TRUCK LICENSE PLATES

B-truck license plates are issued to Second Division vehicles weighing 8,000 pounds or less. New design B-truck license plates have blue characters on a white background. B-truck plates will be replated over the 12 registration months of 2003. Old B-truck license plates are valid through 12/31/03.

The following examples represent various B-truck license plates:

- Two alpha suffix plates (e.g. 0000 BA).
- One alpha suffix plates (e.g. 00000 C).
- Numeric plate of up to six digits (e.g. 000 000).
- Vanity or personalized license plates for B-trucks are available upon written request.



Passenger license plate



Passenger license plate (vanity)



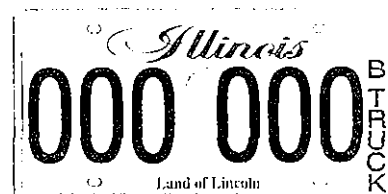
Passenger license plate (personalized)



Deaf/Hard of Hearing license plate



Ham Radio license plate



B-truck license plate

SPECIALTY LICENSE PLATES

Additional fees are charged for most specialty license plates. Specialty license plates may be registered to passenger vehicles, B-trucks and vans weighing 8,000 pounds or less.

America Remembers license plates

America Remembers license plates, honoring those killed in the Sept. 11, 2001 terrorist attacks, are available to any Illinois resident.

Education license plates

Education license plates are available to any Illinois resident.

Environmental license plates

Environmental license plates are available to any Illinois resident (625 ILCS 5/3-627). Vanity and Personalized Environmental license plates are available for additional fees (625 ILCS 5/3-627).

Firefighter Memorial license plates

Firefighter Memorial license plates are available to any Illinois resident (625 ILCS 5/3-634). Vanity and Personalized Firefighter Memorial license plates are available for additional fees.

Illinois/Michigan Canal license plates

Illinois/Michigan Canal license plates are available to any Illinois resident (625 ILCS 5/3-640).

Mammogram license plates

Mammogram license plates are available to Illinois residents who wish to support the Susan G. Komen Breast Cancer Foundation Fund. (625 ILCS 5/3-643).

Master Mason license plates

Master Mason license plates are available to Illinois residents who are members in good standing of a recognized Masonic organization (625 ILCS 5/3-635). Vanity and Personalized Master Mason license plates are available for additional fees.

Mayor/Village President license plates

Mayor/Village President license plates are available to any current mayor or president of a village or incorporated town (625 ILCS 5/3-639).

Organ Donor license plates

Organ Donor license plates are available to any Illinois resident (625 ILCS 5/3-646). Vanity and Personalized Organ Donor license plates are available for additional fees (625 ILCS 5/3-646).

Park District Youth Program license plates

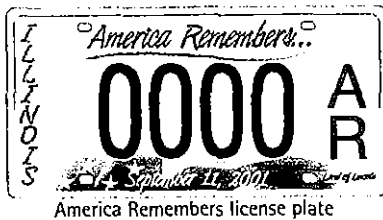
Park District Youth Program license plates are available to any Illinois resident.

Pet Friendly license plates

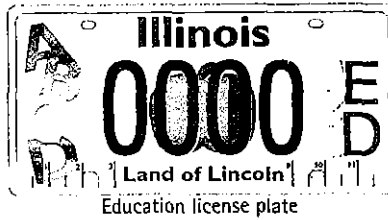
Pet Friendly license plates are available to any Illinois resident.

Police Memorial license plates

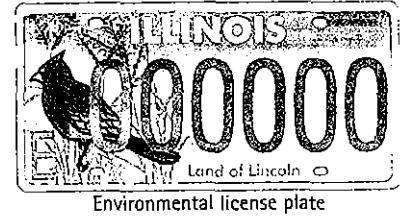
Police Memorial license plates are available to any Illinois resident. (625 ILCS 5/3-644)



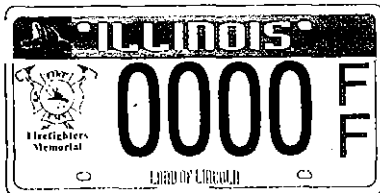
America Remembers license plate



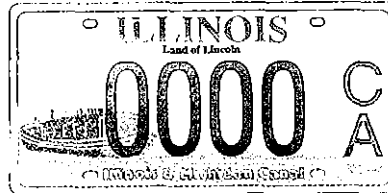
Education license plate



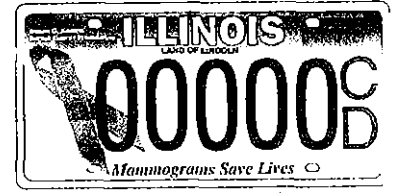
Environmental license plate



Firefighter Memorial license plate



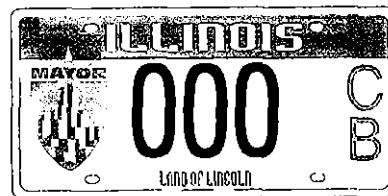
Illinois/Michigan Canal license plate



Mammogram license plate



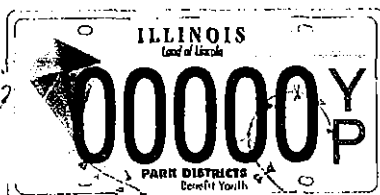
Master Mason license plate



Mayor/Village President license plate



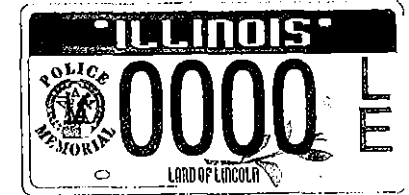
Organ Donor license plate



Park District Youth Program license plate



Pet Friendly license plate



Police Memorial license plate

Prevent Violence license plates

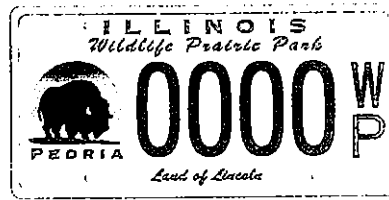
Prevent Violence license plates are available to any Illinois resident (625 ILCS 5/3-630). Vanity and Personalized Prevent Violence license plates are available for additional fees (625 ILCS 5/3-630).



Prevent Violence license plate

Wildlife Prairie Park license plates

Wildlife Prairie Park license plates are available to Illinois residents who wish to support the Wildlife Prairie Park in Peoria (625 ILCS 5/3-632).



Wildlife Prairie Park license plate

Collegiate license plates

Collegiate license plates are available to any Illinois resident (625 ILCS 5/3-629). Collegiate license plates are available for the following institutions: Augustana College, Bradley University, Concordia University, DePaul University, Eastern Illinois University, Illinois State University, Loyola University Chicago, Malcolm X College, Millikin University, Northern Illinois University, Northwestern University, University of Illinois at Urbana-Champaign, University of Illinois at Chicago, University of Illinois at Springfield and Western Illinois University.



Augustana College license plate



Illinois State University license plate



Northwestern University license plate



Bradley University license plate



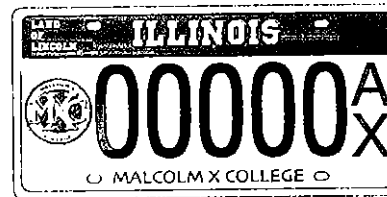
Loyola University Chicago license plate



University of Illinois license plate



Concordia University license plate



Malcolm X College license plate



University of Illinois at Chicago license plate



DePaul University license plate



Millikin University license plate



University of Illinois at Springfield license plate



Eastern Illinois University license plate



Northern Illinois University license plate



Western Illinois University license plate

Military license plates

Military license plates may be displayed on passenger cars, trucks, motorcycles (except Gold Star license plates) and vans weighing 8,000 pounds or less. Korean War Veteran plates may also be registered to recreational vehicles and recreational trailers.

Armed Forces Reserve license plates

Armed Forces Reserve license plates are available to members, former members or surviving spouses of the U.S. Armed Forces Reserves who reside in Illinois (625 ILCS 5/3-622).

Bronze Star license plates

Bronze Star license plates are available to those who have been awarded the military's Bronze Star medal or Combat Infantry Badge (625 ILCS 5/3-628).

Congressional Medal of Honor license plates

Congressional Medal of Honor license plates are available to recipients of the Congressional Medal of Honor (625 ILCS 5/3-609.1).

Disabled Veteran license plates

Disabled Veteran license plates are available to any U.S. Armed Forces veteran who has a 100 percent military disability or is eligible to receive a federal grant toward the purchase of a vehicle. Vehicles displaying these plates may park in spaces reserved for persons with disabilities. Parking meter fees and time limitations are waived, except in areas with designated parking of 30 minutes or less. (625 ILCS 5/3-609)

Ex-prisoner of War (EX-POW) license plates

Ex-prisoner of War (EX-POW) license plates may be issued to any U.S. citizen who was a prisoner of war and is a present or former member of the U.S. Armed Forces or any

of its allies. The name of the ex-prisoner of war must appear as owner or co-owner on both the title and registration applications. The widowed spouse of an ex-prisoner of war may apply for these plates, provided the spouse was married to the ex-prisoner of war at the time of death and is single at the time of application. (625 ILCS 5/3-620)

Gold Star license plates

Gold Star license plates are available to a surviving spouse, or if no spouse, the surviving parent, or if no parent, the surviving sibling of the Gold Star medal recipient. The deceased must have served in the U.S. Armed Forces and lost his/her life while in service, whether in peace-time or war. Only one pair of Gold Star plates may be issued (625 ILCS 5/3-806.4).

Illinois National Guard license plates

Illinois National Guard license plates are available for members, former members or surviving spouses of the Illinois National Guard. (625 ILCS 5/3-621).

Korean War Veteran license plates

Korean War Veteran license plates are available to any Illinois resident who served in the U.S. Armed Forces between June 27, 1950, and July 27, 1954, within the territorial limits of Korea or waters immediately adjacent to, or who has been issued the Korean War Service medal (625 ILCS 5/3-626).



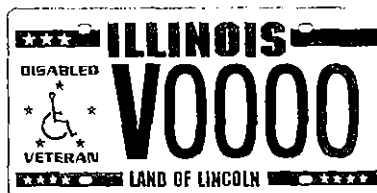
Armed Forces Reserves license plate



Bronze Star license plate



Congressional Medal of Honor license plate



Disabled Veteran license plate



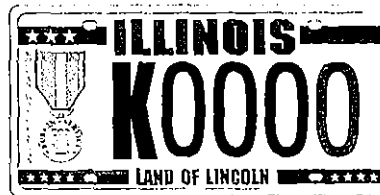
Ex Prisoner of War license plate



Gold Star license plate



Illinois National Guard license plate



Korean War Veteran license plate

Pearl Harbor Survivor license plates

Pearl Harbor Survivor license plates are available to any Illinois resident who served at Pearl Harbor on Dec. 7, 1941, as a member of the U.S. Armed Forces. The widowed spouse of a Pearl Harbor survivor is eligible, provided the widowed spouse was married to the Pearl Harbor survivor at the time of death and single at the time of application (625 ILCS 5/3-625).

POW/MIA license plates

POW/MIA license plates honor Illinois residents who were prisoners of war or missing in action while a member of the U.S. Armed Forces.

Purple Heart license plates

Purple Heart license plates are available to recipients of the military's Purple Heart medal (625 ILCS 5/3-623).

Retired Armed Forces license plates

Retired Armed Forces license plates are available to any retired member of the U.S. Armed Forces who resides in Illinois (625 ILCS 5/3-624).

Silver Star license plates

Silver Star license plates are available for recipients of the military's Silver Star medal (625 ILCS 5/3-642).

United States Marine Corps license plates

U.S. Marine Corps license plates are available to any current or previous member of the U.S. Marine Corps.

Universal Veteran license plates

Universal Veteran license plates are issued to any Illinois resident who has served in the U.S. Armed Forces. Branch of service and/or theater of action decals are available through the Veterans of Foreign Wars, Adjutant-Quarter-Master or the American Legion, Department of the Adjutant. (625 ILCS 5/3-638)

Vietnam Veteran license plates

Vietnam Veteran license plates are available to any Illinois resident who served in the Vietnam conflict. (625 ILCS 5/3-645)

West Point Bicentennial license plates

West Point Bicentennial license plates are available to any Illinois resident. The plate commemorates the 200th anniversary of the founding of West Point Military Academy in New York (625 ILCS 5/3-649).

World War II Veteran license plates

World War II Veteran license plates are available to any Illinois resident who served in the U.S. Armed Forces during World War II.



Pearl Harbor Survivor license plate



POW/MIA license plate



Purple Heart license plate



Retired Armed Forces license plate



Silver Star license plate



United States Marine Corps license plate



Universal Veteran license plate



Vietnam Veteran license plate



West Point Bicentennial license plate



World War II license plate

porting Series license plates

Sporting Series Bass license plates

Sporting Series Bass license plates are available to any Illinois resident who wishes to display his/her sporting allegiance to the large mouth bass (625 ILCS 5/3-631).

Sporting Series Deer license plates

Sporting Series Deer license plates are available to any Illinois resident who wishes to display his/her sporting allegiance to the white tail deer (625 ILCS 5/3-631).

Sporting Series Duck license plates

Sporting Series Duck license plates are available to any Illinois resident who wishes to display his/her sporting allegiance to the duck (625 ILCS 5/3-631).

Sporting Series Goose license plates

Sporting Series Goose license plates are available to any Illinois resident who wishes to display his/her sporting allegiance to the goose (625 ILCS 5/3-631).

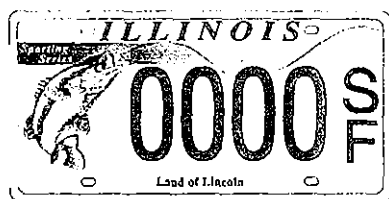
Sporting Series Pheasant license plates

Sporting Series Pheasant license plates are available to any Illinois resident who wishes to display his/her sporting allegiance to the pheasant (625 ILCS 5/3-631).

Sporting Series Turkey license plates

Sporting Series Turkey license plates are available to any Illinois resident who wishes to display his/her sporting allegiance to the turkey (625 ILCS 5/3-631).

NOTE: Environmental, Wildlife Prairie Park, Firefighters Memorial and Sporting Series license plates may also be registered to recreational vehicles and recreational trailers.



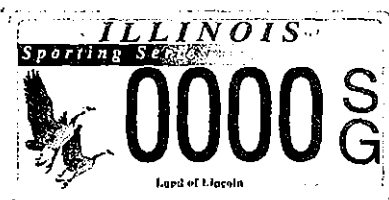
Sporting Series Bass license plate



Sporting Series Deer license plate



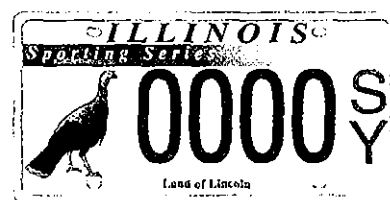
Sporting Series Duck license plate



Sporting Series Goose license plate



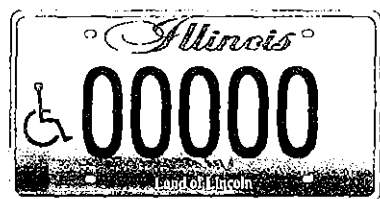
Sporting Series Pheasant license plate



Sporting Series Turkey license plate

PERSONS WITH DISABILITIES LICENSE PLATES

Persons with Disabilities license plates are available to those who have qualifying disabilities who have submitted a physician's certification form verifying disability. These plates are available for passenger vehicles, B-trucks and vans weighing 8,000 pounds or less (625 ILCS 5/3-616). Refer to page 32 for Persons with Disabilities Parking Placards. Vanity and Personalized Persons with Disabilities license plates are available.



Persons with Disabilities license plate



Persons with Disabilities license plate (vanity)



Persons with Disabilities license plate (personalized)



OFFICE OF THE SECRETARY OF STATE

Vehicle Services Department

501 So. 2nd St., Room 312
Springfield, Illinois 62756

JESSE WHITE
SECRETARY OF STATE

New Plate Categories
(Fact Sheet)

1. Legislation must be introduced (by a legislator, either in the Senate or the House), passed by both chambers, and signed into law by the Governor. The Secretary can not arbitrarily begin issuing a new plate category.
2. Once the plate is authorized by law the Vehicle Services Department begins accepting commitment forms containing names & addresses of people who will be applying for the plate when and if it becomes available. No money or applications are accepted at this time, simply names, addresses, daytime telephone numbers and current license plate numbers. Please note: Any promotional materials are the sole responsibility of the sponsoring organization.
3. As the number of requests approaches the 850 level (somewhere between 750 & 850 depending on the amount of time elapsed from the inception of the legislation to the current date) our Communications Department works with someone representing the special interest group on a design of the plate.
4. A sample plate, designed as agreed to by the group and the Secretary of State, with the approval of law enforcement, is produced and signed off by all the aforementioned parties.
5. If the 850 minimum is now a reality an initial production order is placed.
6. Notification and applications are sent to all those that had submitted commitment forms requesting the plate when it became available.
7. Plates are issued as the applications and money are received
8. Additional fees are deposited in the special fund created by the legislation.
9. Once annually the funds, subject to appropriation by the legislature, are forwarded to the organization by the Comptroller.

EXHIBIT

B

tabbies

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
 JUN 28 PM 4:23
Civil Cover Sheet Input Form
 U.S. DISTRICT COURT

This form has been approved for use by the general public for generating the civil cover sheet for filing new cases in the Northern District of Illinois. Your comments about the form and suggestions for improvements are always greatly appreciated.

04C 4316

This automated JS-44 conforms generally to manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois. (Instructions)

JUDGE COAR

I (a) - PLAINTIFFS	DEFENDANTS
Choose Life Illinois, Inc., Richard and Sue Bergquist, James and Phyllis Finnegan, Daniel and Sandra Gura, Becky MacDougall, Virginia McCaskey, Thomas and Bethany Morrison, Dan Proft, Richard and Jill Stanek, Joseph	Jesse White, sued in his official capacity as the Secretary of State of the State of Illinois MAGISTRATE JUDGE MASON
b) - County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases) <input type="text" value="Cook County"/>	County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only) <input type="text" value="Cook County"/>
Plaintiff's Attorney	Defendant's Attorney (If known)
Name: <input type="text" value="Thomas Brejcha"/> Firm: <input type="text" value="Thomas More Society"/> Address: <input type="text" value="29 So. LaSalle St., Suite 440"/> Phone: <input type="text" value="312-782-1680"/>	Name: <input type="text"/> Firm: <input type="text"/> Address: <input type="text"/> Phone: <input type="text"/>

II. Basis of Jurisdiction

(Select from drop menu below)

III. Citizenship of Principal Parties (Diversity cases only)

DOCKETED
 JUN 29 2004

PLAINTIFF

N/A

DEFENDANT

N/A

IV. Origin

(Select from drop menu below)

1. Original Proceeding

V. Nature of Suit (Select one box)

Contract

- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Student Loan - non VA
- ☐ 153 Recovery of VA Benefits
- ☐ 160 Stockholder Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability

Real Property

- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 Other Real Property

Bankruptcy

- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

Torts

Personal Injury

- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury

Civil Rights

- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/Accommodations
- ☐ 444 Welfare
- ☐ 440 Other Civil Rights

Forfeiture/Penalty

- ☐ 610 Agriculture
- ☐ 620 Other Food & Drug
- ☐ 625 Drug Related Seizure of Property 21

Personal Injury

- ☐ 362 Med. Malpractice
- ☐ 365 Personal Injury - Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Pers Property Damage
- ☐ 385 Property Damage Product Liability

Prisoner Petitions

- ☐ 510 Motions to Vacate Sentence
- ☐ 530 Habeas Corpus General
- ☐ 535 Habeas Death Penalty
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition

Labor

- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Mgmt. Relations
- ☐ 730 Labor/Mgmt.

Other Statutes

- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks & Banking
- ☐ 450 Commerce/ICC Rates/ etc
- ☐ 460 Deportation
- ☐ 470 RICO
- ☐ 810 Selective Service
- ☐ 850 Securities / Commodities / Exchange
- ☐ 875 Customer Challenge 12 USC 3410
- ☐ 891 Agricultural Acts
- ☐ 892 Economic Stabilization Act
- ☐ 893 Environmental Matters
- ☐ 894 Energy Allocation Act
- ☐ 895 Freedom of Information Act
- ☐ 900 Appeal of Fee Determination Under Equal Access to Justice
- ☐ 950 Constitutionality of State Statute
- ☐ 890 Other Statutory Actions
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))

Social Security

Property Rights <input type="radio"/> 820 Copyrights <input type="radio"/> 830 Patent <input type="radio"/> 840 Trademark		USC 881 <input type="radio"/> 630 Liquor Laws <input type="radio"/> 640 R.R. & Truck Regulations <input type="radio"/> 650 Airline Regulations <input type="radio"/> 660 Occupational Safety/Health <input type="radio"/> 690 Other	Reporting & Disclosure Act <input type="radio"/> 740 Railway Labor Act <input type="radio"/> 790 Other Labor Litigation <input type="radio"/> 791 E.R.I.S.A.	<input type="radio"/> 864 SSID Title XVI <input type="radio"/> 865 RSI (405(g)) Federal Tax Suits <input type="radio"/> 870 Taxes US Plaintiff or Defendant <input type="radio"/> 871 IRS Third Party 26 USC 7609
VI Cause of Action (CITE THE U. S. STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.) 42 U.S.C. Sec. 1983; First & Fourteenth Amendments to U.S. Constitution; suit to enjoin unconstitutional				
VII. Requested in Complaint	<input type="radio"/> Class Action Under FRCP 23 <input type="radio"/> Not Class Action	Demand <input type="text"/>	Jury Demand (requested in Complaint) <input type="radio"/> Yes <input type="radio"/> No	
VIII. This Case	<input checked="" type="radio"/> is not a refiling of a previously dismissed action. <input type="radio"/> is a refiling of case number <input type="text"/> , previously dismissed by Judge <input type="text"/> .			

Chris Dupler
June 28, 2004

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

In the Matter of

Choose Life Illinois, Inc., et al. vs. Jesse White, etc.

FILED FOR DOCKETING
EASTERN DIVISIONCLERK
U.S. DISTRICT COURT

Case Number:

JUDGE COAR

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Choose Life Illinois, Inc., an Illinois not-for-profit corporation, Richard and Sue Bergquist, James and Phyllis Finnegan,
Daniel and Sandra Gura, Becky MacDougall, Virginia McCaskey, Thomas and Bethany Morrison, Dan Proft,
Richard and Jill Stanek, and Joseph J. and Carol Walsh

(A)		(B)	
SIGNATURE <i>Thomas Brejcha</i>		SIGNATURE MAGISTRATE JUDGE MASON	
NAME Thomas Brejcha		NAME	
FIRM Thomas More Society		FIRM	
STREET ADDRESS 29 So. LaSalle St. -- Suite 440		STREET ADDRESS	
CITY/STATE/ZIP Chicago, Illinois 60603		CITY/STATE/ZIP	
TELEPHONE NUMBER 312-782-1680	FAX NUMBER 312-782-1887	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS brejcha@aol.com		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 0288446		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	

DOCKETED
JUN 29 2004